

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

MAY - 9 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEREMY K. DARLING

Defendant.

4:19CR356 ERW/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

On or about May 9, 2018, in Montgomery County, Missouri, within the Eastern District of Missouri,

JEREMY K. DARLING,

the defendant herein, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance drug, in violation of Title 21, United States Code, Section 841(a)(1); and

The amount of the mixture or substance containing a detectible amount of methamphetamine attributable to defendant by virtue of his own conduct is in excess of fifty (50) grams, punishable under Title 21, United States Code, Section 841(b)(1)(B).

COUNT II

The Grand Jury further charges that:

On or about May 9, 2018, in Montgomery County, Missouri, within the Eastern District of Missouri,

JEREMY K. DARLING,

the defendant herein, did knowingly and intentionally possess a firearm in furtherance of a drug trafficking crime, to-wit: possession with intent to distribute a mixture or substance containing a detectable amount of actual methamphetamine, a Schedule II controlled substance drug, as described in Count I, in violation of Title 18, United States Code, Section 924 (c)(1)(A) and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Count I, the defendant shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

2. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense of Title 18, United States Code, Section 924 (c) or Title 18, United States Code, Section 922(g)(1), as set forth in Count II, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or

intended to be used in said violations. Specific property subject to forfeiture includes, but is not limited to, any firearms and ammunition seized by law enforcement.

3. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to offense set forth in Count II.

4. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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United States Attorney

BETH ORWICK, #52089MO
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